

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

ANTHONY COREY DOTSON
SSN: XXX-XX-6499
3509 BRICK CHURCH PIKE APT. A
NASHVILLE, TN 37207-2001
Debtor.

CHAPTER: 13
CASE NO.: 15-01402
JUDGE: HARRISON

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: January 19, 2018
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: January 31, 2018, at 8:30 a.m. in
Courtroom 1, Customs House, 701 Broadway, Nashville, TN 37203.

NOTICE OF MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

Counsel for the Debtor has asked the court for the following relief: To suspend plan payments.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. **PLEASE NOTE: THE BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE REQUIRES ELECTRONIC FILING. ANY RESPONSE OR OBJECTION YOU WISH TO FILE MUST BE SUBMITTED ELECTRONICALLY. TO FILE ELECTRONICALLY, YOU OR YOUR ATTORNEY MUST GO TO THE COURT WEBSITE AND FOLLOW THE INSTRUCTIONS AT: <https://ecf.tnmb.uscourts.gov>.**

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: US Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state that the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding is.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by calling the Clerk's office at (615) 736-5584 or viewing the case on the Court's website at www.tnmb.uscourts.gov.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: December 29, 2017

Signature: /s/ Alex Koval
Name: ALEX KOVAL
Address: 1222 16th Avenue South, Suite 12
Nashville, TN 37212-2926

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MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

COMES the Debtor, through counsel, Rothschild & Ausbrooks, PLLC, and hereby moves this Court to suspend Chapter 13 plan payments and in support of this motion would state as follows:

1. The Debtor moves to suspend his October, November and December, 2017, plan payments. The Debtor has been unemployed since September and has now found gainful employment with Suristate4s Security LLC and a payroll deduction Order will be issued. The Debtor anticipates being able to make his plan payments upon completion of the suspension.
2. The effect of this suspension caused, Insolve Auto Funding, to miss three (3) monthly disbursements from the Chapter 13 Trustee.
3. Upon resumption, Debtor's plan payments would increase from \$185.00 bi-weekly to \$222.00 bi-weekly.
4. The plan base would remain \$30,727.72, increased by tax refunds, over a plan life of approximately sixty (60) months from confirmation.
5. The dividend to allowed unsecured creditors would remain ten percent (10%) and the unsecured pool would remain non-applicable. No other terms of confirmation would be affected by this suspension.
6. The case would continue on a probationary basis, and may be dismissed upon application of the Trustee in the event of a future plan payment default.
7. Debtor attaches an Amended Family Budget in support of this motion that reflects any changes in income and expenses since the date of filing.
8. Debtor attended the Trustee's money management on March 11, 2015.

Respectfully submitted,

/s/ Alex Koval

ALEX KOVAL

ROTHSCHILD & AUSBROOKS, PLLC

Attorney for Debtor(s)

1222 16th Avenue South, Suite 12

Nashville, TN 37212-2926

(615) 242-3996 (telephone)

(615) 242-2003 (facsimile)

notice@rothschildbklaw.com

CERTIFICATE OF SERVICE

I certify that on this 29th day of December, 2017, I served a copy of the foregoing in the following manner:

Email by Electronic Case Noticing to:

Beth R. Derrick, Asst. U.S. Trustee

Henry E. Hildebrand, III, Chapter 13 Trustee

By U.S. Postal Service, postage prepaid to:

The Debtor at the above listed address and to InSolve Auto Funding, LLC, c/o Capital Recovery Group, Dept 3403, PO Box 123403, Dallas, TX 75312-3403.

/s/ Alex Koval

Alex Koval

2 TOTAL USPS MAILINGS: \$2.00